

From: [James McKenna](#)
To: [Chip Humphrey/R10/USEPA/US@EPA](#); rjw@nwnatural.com
Cc: [Kristine Koch/R10/USEPA/US@EPA](#); jworonets@anchorenv.com
Subject: RE: EPA comments on BHHRA risk tables & calculations
Date: 04/11/2011 03:10 PM

Thanks Chip. Jen, please forward these comments to Exec and the respective technical teams.

Chip and Kristine, a couple of initial thoughts based on my first glance at these comments:

- We are aiming to meet EPA's directed schedule of May 2nd for submitted the revised final draft BHHRA. We will likely not be able to address the comments received today from EPA and meet that deadline. Any modifications per the comments received today will most likely be addressed when we generate the final BHHRA (e.g., after receiving all Agency comments on the May 2nd revised final draft).

- Per your comment #4, it was my understanding that LWG and EPA agreed to include the PBDE risk calculations as an attachment to the risk assessment. I will double-check with Kennedy Jenks to see if their memory and notes match mine. If we are required to include estimated risks and hazards from PBDE in all the tables for cumulative risks and hazards then this is going to require an enormous amount of work. I believe this is why we agreed to handle this issue as an attachment to the BHHRA (especially considering PRGs cannot be calculated). As stated above, I will check with KJ regarding the history of this issue.

Thanks, Jim.

-----Original Message-----

From: Humphrey.Chip@epamail.epa.gov [mailto:Humphrey.Chip@epamail.epa.gov]
Sent: Monday, April 11, 2011 2:52 PM
To: rjw@nwnatural.com; James McKenna
Cc: Koch.Kristine@epamail.epa.gov; jworonets@anchorenv.com
Subject: EPA comments on BHHRA risk tables & calculations

Bob and Jim,

EPA's letter and comments on the combined child/adult scenarios, PBDE and breastmilk tables and calculations for the BHHRA are attached. EPA expects that most of these comments will be addressed in the upcoming revision to the BHHRA, although we recognize that some comments may need to be addressed in the final version to avoid delays in submittal of revised BHHRA.

Please let us know if you have any questions regarding our letter or the attached comments.

thanks
Chip

(See attached file: EPA cover letter Risk Tables Review 041111.pdf)(See attached file: EPA Comments on revised risk tables 4_11_11.pdf)